

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
AUG 17 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DAVID COX,)
ANNA BISE,)
GLEN BEESON,)
MARISSA ZOUGLAS,)
)
Defendants.)

No.

4:16CR00359 JAR/DDN

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including February of 2016, and through the date of this indictment, with the exact dates unknown to this Grand Jury, in St. Louis City, within the Eastern District of Missouri, and elsewhere, the defendants,

**DAVID COX,
ANNA BISE,
GLEN BEESON,
MARISSA ZOUGLAS,**

did knowingly and willfully conspire, combine, confederate and agree together with each other and persons both known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and

Quantity of Methamphetamine Involved in the Conspiracy

With respect to **DAVID COX**, **ANNA BISE**, and **GLEN BEESON**, the amount of methamphetamine involved in the conspiracy attributable to them as result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, punishable under Title 21, United States Code, Section 841(b)(1)(B)(viii).

All in violation of Title 21, United States Code, Section 846.

COUNT II

The Grand Jury charges that:

On or about February 29, 2016, in St. Louis County, and elsewhere within the Eastern District of Missouri, the defendant,

ANNA BISE,

did knowingly and intentionally possess a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, with intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT III

The Grand Jury charges that:

On or about March 23, 2016, in the City of St. Louis, and elsewhere within the Eastern District of Missouri, the defendant,

ANNA BISE,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States

Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT IV

The Grand Jury charges that:

On or about April 5, 2016, in St. Charles County, and elsewhere within the Eastern District of Missouri, the defendant,

GLEN BEESON,

did knowingly and intentionally possess a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, with intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT V

The Grand Jury charges that:

On or about April 6, 2016, in the City of St. Louis, and elsewhere within the Eastern District of Missouri, the defendant,

DAVID COX,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT VI

The Grand Jury charges that:

On or about April 12, 2016, in the City of St. Louis, and elsewhere within the Eastern District of Missouri, the defendant,

MARISSA ZOUGLAS,

did knowingly and intentionally possess a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, with intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts I through VI, the defendant(s) shall forfeit to the United States of America any property, constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used or intended to be used, in any manner or part to commit or to facilitate the commission of such violation(s).
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said violation(s).
3. Specific property subject to forfeiture includes, but is not limited to, the following:
 - a. \$2,500 in US currency seized April 12, 2016,
 - b. \$5,000 in US currency seized April 12, 2016,
 - c. \$9,430 in US currency seized April 12, 2016,
 - d. \$8,359 in US currency seized April 12, 2016,
 - e. \$2,841 in US currency seized April 12, 2016,
 - f. \$8,850 in US currency seized June 20, 2016, and

g. \$40,169 in US currency seized on April 5, 2016.

4. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; ore. has been commingled with other

property which cannot be divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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